

EXHIBIT 1

- c. He currently works as the Medical Director of Piedmont Pain Medicine, PC in Danville, VA.
 - d. He has devoted more than one-half of his professional time to the active clinical practice in his fields of licensure.
 - e. As a physician and the owner of a clinic where epidural steroid injections are performed, where medications for such procedures are purchased and handled, where patient records are documented, where procedures and drugs are coded and billed, he practices under the same standard of care applicable to the physician and clinic defendants in this case.
 - f. He is familiar with the applicable standard of care pertaining to and concerning the administration of sterile steroid injections into the indicated regions of patients.
 - g. Based on the above qualifications, Dr. Winikur and I believe he is competent to express opinions regarding the fields of Medicine, Pain Management, Health Care Administration, including but not limited to administration, procurement and billing associated with the sterile steroids.
- 5. The facts of this case have been shared with Dr. Winikur and reviewed by him.
 - 6. Based on the above qualifications, I reasonably expect that his opinions could be admissible at trial.
 - 7. Dr. Winikur has opined that Defendants Minnesota Surgery Center, Medical Advanced Pain Specialists, P.A. and Dr. David Schultz, deviated from the applicable standard of care and by that action caused injury to Plaintiff Susan Edwards.

Signed under the pains and penalties of perjury on December 19, 2013.



Kimberly A. Dougherty Esq.